



Mille Lacs Band of Ojibwe Indians
Gaming Regulatory Authority
Detailed Gaming Regulations

DROP AND COUNT STANDARDS

Document No. DGR – 16

Effective: December 17, 2013

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- I. SCOPE.** This document includes the Detailed Gaming Regulations for Drop and Count to be regulated and conducted in compliance with Title 15 of the Mille Lacs Band Statutes Annotated.
- II. GAME REGULATIONS APPLICABLE TO DROP AND COUNT.** A Gaming Enterprise shall comply with all requirements set forth in applicable Federal Regulations and Mille Lacs Band Detailed Gaming Regulations.
- Section 1.** The Gaming Enterprise shall implement a System of Internal Control Standards (SICS), as approved by the Gaming Regulatory Authority (GRA) Board.
- Section 2.** Subsequent revisions to the SICS must be provided to the GRA 30 days prior to implementation.
- Section 3.** The GRA reserves the right to require changes to any internal control or procedure to ensure compliance with applicable laws and regulations.
- III. COMPUTER APPLICATIONS.** For any computer applications utilized, alternate documentation and procedures that provide at least the level of control described by the standards in this regulation, as approved by the GRA, will be acceptable.
- IV. SUPERVISION.** Supervision must be provided for drop and count as needed by an associate(s) with authority greater than those being supervised.
- V. SECURITY OF THE COUNT ROOMS.**
- Section 1.** Access to the count room(s) during the count must be restricted to associates of the Drop and Count Teams, with the exception of authorized personnel, observers and supervisors for resolution of problems.
- Section 2.** Access to the count room(s) at other than scheduled count times must be restricted to authorized personnel.
- Section 3.** Authorized personnel, observers and supervisors entering the count room for resolution of problems must comply with count room personnel inspection policies.
- Section 4.** Surveillance must be notified whenever any person enters or exits the count room.
- Section 5.** All coin, tokens, chips and cash inventory stored in the count room must be secured from unauthorized access at all times.
- Section 6.** Procedures for the transport of extraneous items into and out of the count room must be implemented.
- VI. SOFT COUNT ROOM ASSOCIATES.**
- Section 1.** The table/card game drop box and VGC bill acceptor count must be performed by a minimum of three (3) associates.
- Section 2.** Count Team associates shall not exit or enter the count room during the count except for emergencies or scheduled breaks. At no time during the count shall there be fewer than three (3) associates in the count room until the drop proceeds have been accepted into cage/vault accountability. Surveillance must be notified whenever Count Team associates exit or enter the count room during the count.



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Section 3. Count Team associates must be rotated on a routine basis such that the Count Team is not consistently the same three (3) persons more than four (4) days per week. This standard does not apply to a Gaming Enterprise that utilizes a count team of more than three (3) persons.

Section 4. The Count Team shall be independent of transactions being reviewed and counted. The Count Team shall be independent of the Cage/Vault Departments.

Section 5. The Count Team associates must wear jumpsuits while in the count rooms.

Section 6. The jumpsuits must be inspected on a daily basis by another department, independent of the count, prior to and at the end of the count.

Section 7. The jumpsuits must be stored in a designated area approved by the GRA Board, outside of the count rooms, and must be put on at the commencement and taken off at the end of the Count Team associate's shift.

Section 8. Count Team associates must remove shoes and socks in the man trap area and show the shoes and socks to an associate independent of the drop process.

VII. HARD COUNT ROOM ASSOCIATES.

Section 1. The weigh/count must be performed by a minimum of three (3) associates.

Section 2. At no time during the weigh/count shall there be fewer than three (3) associates in the count room until the drop proceeds have been accepted into cage/vault accountability. Surveillance must be notified whenever Count Team associates exit or enter the count room during the count.

Section 3. If the VGC count is conducted with a continuous mechanical count meter that is not reset during the count and is verified in writing by at least three (3) associates at the start and end of each denomination count, then one (1) associate may perform the wrap.

Section 4. Count Team associates shall be rotated on a routine basis such that the Count Team is not consistently the same three (3) associates more than four (4) days per week. This standard does not apply to Gaming Enterprises that utilize a Count Team of more than three (3) persons.

Section 5. The Count Team shall be independent of transactions being reviewed and counted. The Count Team shall be independent of the Cage/Vault Departments.

Section 6. The Count Team associates shall wear jumpsuits while in the count rooms.

Section 7. The jumpsuits must be inspected on a daily basis by another department, independent of the count at the commencement and end of the count.

Section 8. The jumpsuits must be stored in a designated area approved by the GRA Board, outside of the count rooms, and must be put on at the commencement and taken off at the end of the Count Team associate's shift.

Section 9. Count Team associates shall remove shoes and socks in the man trap and show the shoes and socks to an associate independent of the drop process.

VIII. VGC DROP ASSOCIATES.

Section 1. VGC drop process must be performed by a minimum of three (3) associates.

Section 2. Drop Team associates shall not be allowed to exit or enter the secured drop zone except for emergencies or scheduled breaks.

Section 3. The Drop Team shall be independent of the VGC Department with the exception of emergency drops.

Section 4. The Drop Team associates shall wear jumpsuits during the entire drop process.



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Section 5. The jumpsuits must be inspected on a daily basis by another department, independent of the drop, prior to and at the end of the entire drop/count process.

Section 6. Drop Team jumpsuits must be stored in the same manner as all other count jumpsuits.

Section 7. All Gaming Enterprise associates involved in the coin drop process must be inspected by an associate independent of the drop process at any time upon leaving the drop.

IX. TABLE/CARD GAME DROP STANDARDS.

Section 1. The setting out of empty table/card game drop boxes and the drop must be a continuous process.

Section 2. All table/card game drop boxes must be removed only at the time previously designated by the Gaming Enterprise and reported to the GRA Board, except for emergency drops.

Section 3. At the end of each shift:

- A. A separate drop box must be placed on each table opened at any time during each shift, or a Gaming Enterprise may utilize a single drop box with separate openings and compartments for each shift;
- B. All drop boxes must be removed from the table by an associate independent of the pit shift being dropped; and
- C. Upon removal from the table, drop boxes must be transported directly to the count room or other equivalently secure area with comparable controls and locked in a secure manner until the count takes place.

Section 4. The transporting of drop boxes must be performed by a minimum of two (2) associates, at least one (1) of whom is independent of the pit shift being dropped.

Section 5. All drop boxes must be posted with a number corresponding to a permanent number on the gaming table and marked to indicate game, table number and shift.

Section 6. Surveillance must be notified when the drop is to begin so that Surveillance may monitor the activities. The drop begins with the removal of the first drop box.

X. VGC BILL ACCEPTOR DROP STANDARDS.

Section 1. A minimum of three (3) associates shall be involved in the removal of the VGC drop, all of whom are independent of the VGC Department.

Section 2. All bill acceptor canisters must be removed only at the time previously designated by the Gaming Enterprise and reported to the GRA Board, except for emergency drops.

Section 3. Surveillance must be notified when the drop is to begin so that Surveillance may monitor the activities. The VGC bill acceptor drop begins when the first bill acceptor box is removed.

Section 4. The bill acceptor canisters must be removed by an associate independent of the VGC Department and then transported directly to the count room or other equivalently secure area with comparable controls and locked in a secure manner until the count takes place.

- A. Security must be provided over the bill acceptor canisters removed from the VGCs and awaiting transport to the count room.
- B. The transporting of bill acceptor canisters must be performed by a minimum of two (2) associates, both of whom are independent of the VGC Department.

Section 5. All bill acceptor canisters must be posted with a number corresponding to a permanent number on the VGC. Alternatively, a smart can system that electronically identifies and tracks



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the VGC number, and facilitates the proper recognition of gaming revenue, will satisfy the requirements of this section.

XI. TABLE/CARD GAME DROP BOX AND VGC BILL ACCEPTOR SOFT COUNT STANDARDS.

Section 1. The table/card game drop box and VGC bill acceptor count must be performed in a soft count room or other equivalently secure area with comparable controls.

Section 2. If counts from various revenue centers occur simultaneously in the count room, procedures must be in effect that prevent the commingling of funds from different revenue centers.

Section 3. The Count Team shall not have access to the bill-in meter amounts until after the count is completed and the drop proceeds are accepted into the cage/vault accountability. A Count Team associate is allowed to read/record the amount from the bill-in meters provided the Count Team associates do not have knowledge of the dollar amount of currency contained in the bill acceptor canisters pursuant to the bill-in meter during the count process.

Section 4. At least once weekly, prior to the count, at least two (2) Count Team associates shall verify the accuracy of the currency counter with previously counted currency for each denomination (i.e., test currency). The test currency must be counted by the currency counter to ensure that the counter is functioning properly. The test results must be documented and maintained.

A. The currency counter test must be performed with the test currency rather than with currency from a drop box or canister.

B. If the same currency counter is used for one revenue center (e.g., gaming or nongaming revenue center) and then immediately used for a second revenue center, performing the currency counter test once will satisfy the standard, provided the same Count Team associates complete one (1) count and then proceed to the other revenue center count.

Section 5. The table/card game drop boxes and bill acceptor canisters must be individually emptied and counted in such a manner to prevent the commingling of funds between boxes and canisters until the count of the box or canister has been recorded.

A. The count of each box or canister must be recorded in ink or other permanent form.

B. For counts that do not utilize a currency counter, a second count must be performed by an associate on the Count Team who did not perform the initial count. Separate counts of chips and tokens must always be performed by associates of the Count Team.

C. Coupons or other promotional items not included in gross revenue may be recorded on a supplemental document by either the Count Team associates or Accounting associates. All single-use coupons must be cancelled daily by either the Count Team associates or Accounting associates to prevent recirculation.

D. If a currency counter interface is used, it must be adequately restricted (e.g., password, keys, etc.) to prevent unauthorized access. The currency drop figures must be transferred via direct communications line or computer storage media to the Accounting Department.

Section 6. If currency counters are utilized and the count room table is used only to empty boxes and canisters and sort/stack contents, a Count Team associate shall observe the loading and unloading of all currency at the currency counter, including rejected currency.



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- Section 7.** When the currency counter rejects currency but does not record the amount of rejected currency (re-run of rejected currency is permissible), a Count Team associate shall record the rejected currency amount by table/VGC to ensure that two (2) counts of the rejected currency (by table/VGC and in total) are performed and the correct amount of the drop is recorded on the count sheet. Posting rejected currency to a nonexistent table/VGC is prohibited.
- Section 8.** Table/card game drop boxes and VGC canisters, when empty, must be shown to another member of the Count Team, or to another associate who is observing the count, and to Surveillance, provided the count is monitored in its entirety by a person independent of the count.
- Section 9.** Fill/credit slips removed from the drop boxes must be matched to the fill/credit slips obtained from the cage or otherwise reconciled by the Count Team associates or Accounting/Revenue Audit associates to verify that the dollar amounts for the shift are identical. Fills and credits must be traced to or recorded on the count sheet.
- Section 10.** The opening/closing table inventory forms (if applicable) must either be:
- A. Examined and traced to or recorded on the count sheet; or
 - B. If a computerized system is used, Accounting associates can trace the opening/closing table inventory forms to the count sheet. Discrepancies must be investigated with the findings documented and maintained for inspection.
- Section 11.** To correct errors in soft count documentation, a single line must be drawn through the error, and the correct figure entered above the original figure. The correction must be initialed by at least two (2) Count Team associates verifying the change. If a currency interface is used, corrections to the table/card games count data must be made using one of the following:
- A. Draw a single line through the error on the soft count document, and write the correct figure above the original figure. The correction must be initialed by the two (2) Count Team associates verifying the change. If this procedure is used, an associate independent of the Table Games/VGC Department and Count Team shall enter the correct figure into the computer system prior to the generation of related table games/VGC reports; or
 - B. During the count process, correct the error in the computer system and enter the passwords of at least two (2) Count Team associates. If this procedure is used, an exception report will be generated by the computer system identifying the table/VGC number, the error, the correction and the Count Team associates attesting to the correction.
 - C. If the computer system does not allow corrections as specified in (B), management shall develop and implement alternative procedures for documenting corrections to the soft count records and communicating the information to the Accounting Department.
- Section 12.** The count sheet will be reconciled to the total drop and variances must be reconciled and documented by a Count Team associate who does not function as the sole recorder.
- Section 13.** All members of the Count Team shall sign the count document or a summary report to attest to their participation in the count.
- Section 14.** All drop proceeds and cash equivalents that were counted must be turned over to the cage or vault cashier (who must be independent of the Count Team) or to an authorized associate independent of the revenue generation and the count process for verification. Such associate shall certify by signature as to the amount of the drop proceeds delivered and received. The individual performing the verification count shall not have prior knowledge of the results of previous count performed by Count Team associates. Any unresolved variances must be reconciled, documented and investigated by Accounting/Revenue Audit.



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Section 15. The count sheet, with all supporting documents, must be delivered to the Accounting Department by a Count Team associate or an associate independent of the Cage Department. Alternatively, it may be adequately secured (e.g., locked container to which only Accounting associates can gain access) until retrieved by the Accounting Department.

Section 16. The Cage/Vault associate shall sign the count sheet, or other reconciling document, and thereby assume accountability of the currency drop proceeds, ending the count.

Section 17. Access to stored, full table/card game drop boxes and stored, full bill acceptor canisters must be restricted to authorized members of the drop and count teams.

XII. VGC COIN DROP STANDARDS.

Section 1. A minimum of three (3) associates shall be involved in the removal of the VGC drop, at least one (1) of whom is independent of the VGC Department.

Section 2. All drop buckets must be removed only at the time previously designated by the Gaming Enterprise and reported to the GRA Board, except for emergency drops.

Section 3. Surveillance must be notified when the drop is to begin in order that Surveillance may monitor the activities. The VGC coin drop begins when the first drop bucket is removed.

Section 4. Security must be provided over the buckets removed from the VGC drop cabinets and awaiting transport to the count room.

Section 5. As each machine is opened, the contents must be tagged with its respective VGC number if the bucket is not permanently marked with the VGC number. The contents must be transported directly to the area designated for the counting of such drop proceeds. If more than one (1) trip is required to remove the contents of the VGCs, the filled carts of coins must be securely locked in the room designed for counting or in another equivalently secure area with comparable controls. There must be a locked covering on any carts in which the drop route includes passage out of doors. Alternatively, a smart bucket system that electronically identifies and tracks the VGC number, and facilitates the proper recognition of gaming revenue, satisfies the requirements of this section.

Section 6. Each drop bucket in use must be:

- A. Housed in a locked compartment separate from any other compartment of the VGC and keyed differently than other VGC compartments; and
- B. Identifiable to the VGC from which it is removed. If the VGC is identified with a removable tag that is placed in the bucket, the tag must be placed on top of the bucket when it is collected.

Section 7. Each VGC that accepts coins or tokens must have drop buckets into which coins or tokens that are retained by the VGC are collected. Drop bucket contents must not be used to make change or pay hand-paid payouts.

XIII. EMERGENCY DROP PROCEDURES.

Section 1. The Gaming Enterprise shall establish and comply with procedures regarding emergency drops. An emergency drop is any drop outside of the normal scheduled drop times. The procedures at a minimum must include:

- A. Notification to Surveillance prior to the drop;
- B. Notification to the GRAOGRNotifications@grcasinos.com within eight (8) hours which must include:



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1. Date and time;
2. Location of table/VGC; and
3. Reason;
- C. Authorized associates;
- D. Secured storage of funds; and
- E. Inspection procedures.

XIV. VGC COIN COUNT AND WRAP STANDARDS.

Section 1. Coins include tokens.

Section 2. The VGC coin count and wrap must be performed in a count room or other equivalently secure area with comparable controls.

Section 3. If counts from various revenue centers occur simultaneously in the count room, procedures must be in effect that prevent commingling funds from different revenue centers.

Section 4. The following functions must be performed in the counting of the VGC drop:

- A. Recorder function, which involves the recording of the VGC count; and
- B. Count Team supervisor function, which involves the control of the VGC weigh and wrap process. The supervisor shall not perform the initial recording of the weigh/count unless a weigh scale with a printer is used.

Section 5. The VGC drop must be counted, wrapped and reconciled in such a manner to prevent commingling VGC drop coin with coin (for each denomination) from the next VGC drop until the count of the VGC drop has been recorded. If the coins are not wrapped immediately after being weighed or counted, they must be secured and not commingled with other coin.

Section 6. The amount of the VGC drop from each machine must be recorded in ink or other permanent form on a VGC count document by the recorder or mechanically printed by the weigh scale. If a weigh scale interface is used, the count figures must be transferred via direct communications line or computer storage media to the Accounting Department.

Section 7. Corrections to information originally recorded by the Count Team on VGC count documentation must be made by drawing a single line through the error, writing the correct figure above the original figure, and then obtaining the initials of at least two (2) Count Team associates who verified the change.

Section 8. If a weigh scale interface is used, corrections to VGC count data must be made using one (1) of the following:

- A. Drawing a single line through the error on the VGC document, writing the correct figure above the original figure, and then obtaining the initials of at least two (2) Count Team associates. An associate independent of the VGC Department and Count Team shall enter the correct figure into the computer system prior to the generation of related VGC reports; or
- B. During the count process, correct the error in the computer system and enter the passwords of at least two (2) Count Team associates. An exception report must be generated by the computer system identifying the VGC number, the error, the correction and the Count Team associates attesting to the correction.

Section 9. If applicable, the weight must be converted to dollar amounts prior to the reconciliation of the weigh to the wrap.

Section 10. If a coin meter is used, a Count Team associate shall convert the coin count for each denomination into dollars and shall enter the results on a summary sheet.



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Section 11. The recorder and at least one (1) other Count Team associate shall sign the weigh tape and the VGC count document attesting to the accuracy of the weigh/count.

Section 12. All members of the Count Team shall sign the count document or a summary report to attest to their participation in the count.

Section 13. All drop proceeds and cash equivalents that were counted must be turned over to the Cage or Vault cashier (who must be independent of the Count Team) or to an authorized associate independent of the revenue generation and the count process for verification. Such associate shall certify by signature as to the accuracy of the drop proceeds delivered and received.

Section 14. All VGC count and wrap documentation, including any applicable computer storage media, must be delivered to the Accounting Department by a Count Team associate or an associate independent of the Cage Department. Alternatively, it may be adequately secured (e.g., locked container to which only Accounting associates can gain access) until retrieved by the Accounting Department.

Section 15. If the coins are transported off the property, a second (alternative) count procedure must be performed before the coins leave the property. Any variances must be documented.

Section 16. Large (by denomination, either \$1,000.00 or 2% of the drop, whichever is less) or unusual (e.g., zero for weigh/count or patterned for all counts) variances between the weigh/count and wrap must be investigated by management associates independent of the VGC Department, Count Team, and the cage/vault functions on a timely basis. The results of such investigation must be documented, maintained for inspection and provided to the GRA Board in a timely manner.

XV. SECURITY OF THE COUNT ROOM INVENTORY DURING THE VGC COIN COUNT AND WRAP. All of the following requirements must be completed at the conclusion of the count:

Section 1. At least two (2) members of the Count/Wrap Team shall count the final wrapped VGC drop independently from each other;

Section 2. The counts must be recorded on a summary report;

Section 3. Prior to verification of the count by Cage/Vault associates, the same Count Team members (or the Accounting Department) shall compare the final wrap to the weigh/count, recording the comparison and noting any variances on the summary report;

Section 4. A member of the Cage/Vault Department shall count the wrapped VGC drop by denomination and reconcile it to the weigh/count;

Section 5. At the conclusion of the reconciliation, at least two (2) Count Team members and the Cage/Vault associate shall sign the summary report attesting to its accuracy;

Section 6. The wrapped coins (exclusive of proper transfers) must be transported to the cage, vault or coin vault after the reconciliation of the weigh/count to the wrap; and

Section 7. The Count Team shall not have access to coin drop meter amounts until after the count is completed and the drop proceeds have been accepted into the cage/vault accountability. A Count Team member is allowed to read/record the amount from the coin-in meters provided the Count Team members do not have knowledge of the dollar amount of coin contained in the drop buckets pursuant to the coin-in meters during the count process.

XVI. TRANSFERS OF CURRENCY AND COIN DURING THE COUNT.



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- Section 1.** The Gaming Enterprise shall establish and comply with procedures regarding transfers of currency and coin during the count and wrap process.
- Section 2.** Each transfer must be recorded on a separate multi-part form with a preprinted or concurrently-printed form number that shall be subsequently reconciled by the Accounting Department.
- Section 3.** Each transfer must be counted and signed for by at least two (2) members of the Count Team and by an associate independent of the Count Team who is responsible for authorizing the transfer.
- Section 4.** At least one (1) part of the transfer must remain in the count room until the drop has been accepted into the cage/vault accountability. The other part of the transfer form must accompany the funds transferred from the count room during the count.

XVII. EQUIPMENT STANDARDS FOR VGC COUNT.

- Section 1.** A weigh scale calibration module must be secured to prevent unauthorized access (e.g., prenumbered seal, lock and key, etc.).
- Section 2.** An associate independent of the Cage, Vault, VGC, and Count Team functions shall be present whenever the calibration module is accessed. Such access must be documented and maintained.
- Section 3.** If a weigh scale interface is used, it must be adequately restricted to prevent unauthorized access (passwords, keys, etc.).
- Section 4.** If the weigh scale has a zero adjustment mechanism, it must be physically limited to minor adjustments (e.g., weight of a bucket) or physically situated such that any unnecessary adjustments to it during the weigh process would be observed by other Count Team members.
- Section 5.** The weigh scale and weigh scale interface (if applicable) must be tested by a person or persons independent of the Cage, Vault, VGC and Count Team Departments at least quarterly. At least annually, this test must be performed by Internal Audit in accordance with the internal audit standards. The results of these tests must be documented and signed by the person or persons performing the test.
- Section 6.** Immediately prior to the VGC count, at least two (2) associates shall verify the accuracy of the weigh scale with varying weights or with varying amounts of previously counted coin for each denomination to ensure the scale is properly calibrated (varying weights/coin from drop to drop is acceptable).

History. Approved by the Gaming Regulatory Authority on April 8, 2011. **Effective date April 8, 2011.**

Changes to grammar and formatting where applicable. Change “shall” to “must” where applicable. Change “employee”, “team”, “members” and “personnel” with “associate” where applicable. Change “gaming machine” with “Video Games of Chance” or “VGC” where applicable. Change “table game” with “table/card game” where applicable. Part I: add SCOPE. This section includes the Detailed Gaming Regulations for Drop and Count to be regulated and conducted in compliance with Title 15 of the Mille Lacs Band Statutes Annotated. Part II: add GAME REGULATIONS APPLICABLE TO DROP AND COUNT. GAME REGULATIONS APPLICABLE TO DROP AND COUNT. A Gaming Enterprise shall comply with all requirements set forth in applicable Federal Regulations and Mille Lacs Band Detailed Gaming Regulations. Section 1. The Gaming Enterprise shall implement a System of Internal Control Standards (SICS), as approved by the Gaming Regulatory Authority (GRA) Board. Section 2. Subsequent revisions to the SICS must be provided to the GRA 30 days prior to implementation of revision. Section 3. The GRA reserves the right to require changes to any internal control or procedure to ensure compliance to applicable laws and



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regulations. Part III: remove “/or” from “and/or” before procedures; replaced “section” with “regulation” after this; replaced “Gaming Regulatory Authority Board (hereinafter “GRA Board”),” with “GRA” after the Part IV: add SUPERVISION SUPERVISION. Supervision must be provided for drop and count as needed by an associate(s) with authority greater than those being supervised. Part V Section 1: added “personnel,” after authorized; removed “and authorized maintenance personnel.” after problems Part V Section 3: added “and” before supervisors; added “entering the count room” after supervisors; removed “, and authorized maintenance personnel” after problems Part V add Section 6. Section 6. Procedures for the transport of extraneous items into and out of the count room must be implemented. Part VI Section 2: removed “be allowed to” after not; Part VI Section 3: replaced “shall” with “does” after standard Part VI Section 7: removed “and taken off, prior to and” after on; added “and taken off at the end” after commencement Part VI Section 4: replaced “shall” with “does” after standard Part VI Section 7: removed “, prior to and” after count; added “and end” after commencement Part VIII Section 5: replaced “will” with “must” after jumpsuits; Part IX: add Section 2: Section 2. All table/card game drop boxes must be removed only at the time previously designated by the Gaming Enterprise and reported to the GRA Board, except for emergency drops. Part IX section 3: replace “tables, table game” with “table” before drop boxes Part IX Section 6: removed “table game” before drop box Part XI Section 6: removed “be able to” before observe Part XI Section 7: changed “procedures shall be developed and implemented to” with “a Count Team Associate shall” before record; replaced “to ensure” with “and” after performed; removed “dummy” after nonexistent Part XI Section 11(A): changed “table games/gaming machine” to “soft count” before document Part XI Section 11(C): changed “correcting” with “corrections” after documenting Part XI Section 12: added “and variances will be reconciled and documented” after drop; removed “and variances will be reconciled and documented.” after recorder Part XI Section 14: replaced “be precluded from having” with “not have” after shall Part XI Section 15: replaced “cashiers department” with “Cage Department” after the; Part XII Section 5: replaced “shall satisfy” with “satisfies” before the; replaced “paragraph” with “section” after this Part XII: deleted Section 8 Section 8. The collection procedures may include procedures for dropping gaming machines that have trays instead of drop buckets. Part XIII Section 1(A): replaced “the GRA which shall include:” with “Surveillance prior to the drop;” after to Part XIII Section 1(B): replaced “Notification to Surveillance;” with “Notification to the GRAOGRNotifications@grcasinos.com within eight (8) hours which shall include:” Part XIV Section 8(A): removed “If this procedure is used,” Part XIV Section 8(B): removed “If this procedure is used,” Part XV: moved Section 1 (original) to Part XV, Section 2 now Section 1

**Each Gaming Enterprise shall come into compliance with changes no later than October 1, 2014.
Each Gaming Enterprise may petition the GRA Board for an extension of up to six (6) months.
Approval of an extension is discretionary.**